

Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 East 42nd St.
New York, New York 10165

Telephone: (212) 317-1200
Facsimile: (212) 317-1620

June 11, 2021

BY ECF & ELECTRONIC MAIL

Honorable John P. Cronan
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: 20-cv-09922-JPC; Manzano Tiburcio, et al. v. Pine Bar & Grill LLC, et al.

Your Honor:

This firm represents Plaintiff in the above-referenced matter. The parties will be resolving this case through a Rule 68 Offer of Judgment (the "Offer") pursuant to *Mei Xing Yu v. Hasaki Rest., Inc.*, 944 F.3d 395, 414 (2d Cir. 2019). However, the parties need a bit more time to finalize their materials and submit the Offer to the Court. As such, the parties respectfully request that the deadline to submit settlement materials to the Court by today, June 14, 2021, be converted to a deadline to submit the Offer, and be extended by two weeks. This is the first request of its kind and is submitted on consent. The parties apologize for the tardiness of this request. Additionally, I apologize for filing the wrong letter with Your Honor previously (Doc. No. 30).

Thank you for your time and attention.

Respectfully Submitted,

/s/

Jesse Barton, Esq.
Michael Faillace & Associates, P.C.
Attorneys for Plaintiff

This request is granted. The parties shall file any necessary materials pursuant to Rule 68 by June 28, 2021.

The Clerk of Court is respectfully directed to strike the letter motion filed at Docket Number 30.

SO ORDERED.

Date: June 14, 2021

New York, New York



JOHN P. CRONAN
United States District Judge